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July 26, 2002

Via Electronic Filing

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW, Room TWB-204
Washington, DC 20554

Re: Notice of oral ex parte communications, Joint Application by BellSouth Corporation, BellSouth Telecommunications, Inc., and BellSouth Long Distance, Inc. for Provision of In-Region, InterLATA Services in Alabama, et al., WC Docket No. 02-150

Dear Ms. Dortch:

Yesterday, David Eppsteiner, Sharon Norris, Jay Bradbury, Rich Rocchini and the undersigned, all representing AT&T, met with Aaron Goldberger, William Kehoe, Gina Spade, Cecilia Seppings and Pam Slipakoff, of the FCC's Wireline Competition Bureau; Steven Rangell, Denise Coca and Heidi Kroll of the FCC's Wireless Bureau; and Hillary DeNigro and Mark Gerner of the FCC's Enforcement Bureau. The purpose of meeting was to preview the Reply Comments and Affidavits that AT&T will be filing next week in the above-referenced proceeding. The attached documents were presented.

Consistent with Commission rules, I am filing one electronic copy of this notice and request that you place it in the record of the proceeding.

Sincerely,

Joan Marsh

cc: Aaron Goldberger

The OSS improvements anticipated in the GALA Order are not being realized.

- Reliance on manual processes for ordering has increased in 2002.
  - 1 of every 5 electronically submitted LSRs is routed to the LCSC because of BellSouth system design and system error
    - In May 104,696 LSRs were impacted (19.97%)
  - In total approximately1 of every 3 LSRs receives manual processing
    - In May 168,467 LSRs were processed manually (29.88%)

- The rate at which BellSouth's system makes errors in processing valid non-LNP LSRs was 21% greater in May than it was in January

BellSouth System Errors – Non-LNP LSRs			
	Volume	Validated LSRs	Percent BellSouth System Error
January	41,734	345,261	12.09%
May	57,638	395,004	14.59%
Percent Change	38%	14%	21%

- BellSouth's GALA filings had promised significant reductions in system errors

- The estimated LCSC LSR load in May was 168,467 LSRs
  - 62.2% (104,696 LSRs) of that load was fallout of electronically submitted LSRs caused by BellSouth
    - 45,943 designed manual fallout
    - 58,753 system errors
  - Only 14.4% (24,312 LSRs) was related to CLEC input error
  - 23.4% (39,459) were manually submitted LSRs (estimated)

- Manual processing of valid electronically submitted LSRs subjects them to delay and increased error.
  - Electronic LSRs that are routed to the LCSC for manual processing wait in queue for hours before any work on them is performed
    - The "claim intervals" for AT&T's LSRs in May were:

AT&T OCN	Claim Interval Hr:Min
7125	15:49
7170	19:02
7562	16:33
8300	20:30
8392	20:38
8389	17:30

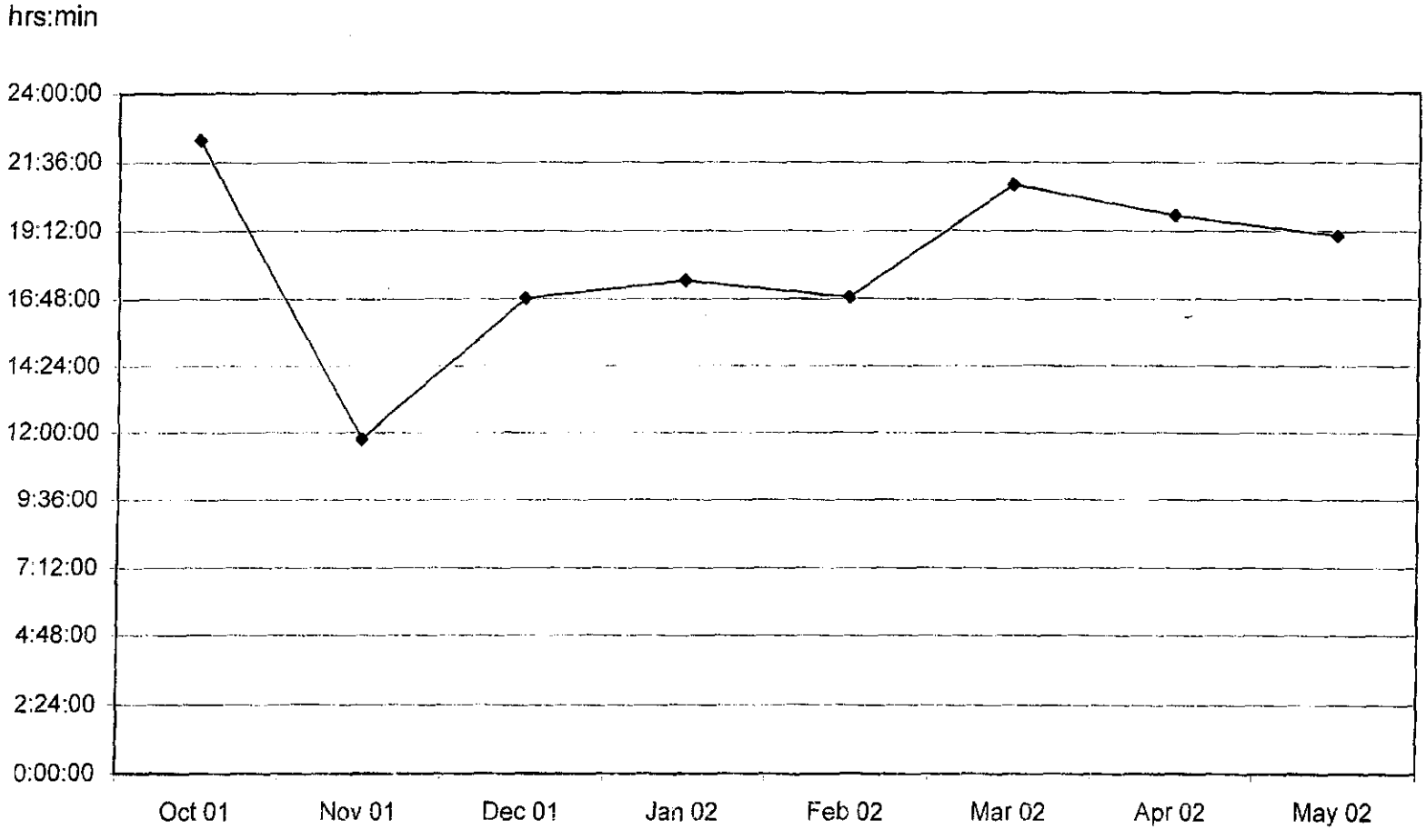
    - Historical claim interval data is similar

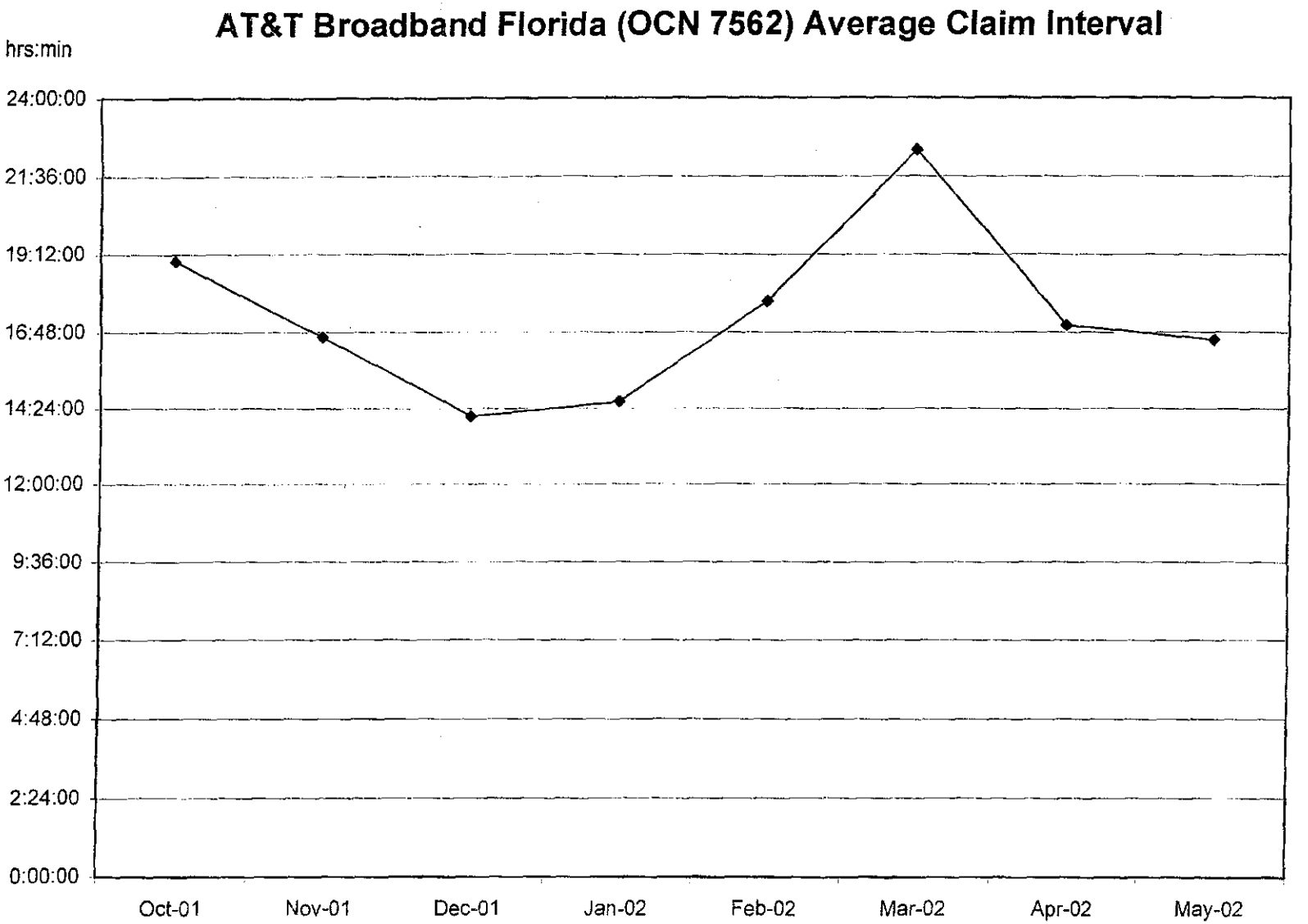
- BellSouth's Service Order Accuracy data, while of questionable quality, demonstrates that manual process significantly increases provisioning errors
  - BellSouth's July 23, 2002 ex parte data is incomplete and contains errors
    - The universe of completed service orders is grossly understated
      - MSS reports reflect over 323,000 completed service orders in May versus 260,527 in BellSouth's SOA data
    - The summary lines are inaccurate and overstate results in all but one case
  - Taken at face value that data reveals that manually processed orders are provisioned in error twice as often as flow through orders
  - The data does not reflect other errors such as rejections in error

- Improvements are dependent upon the ineffective Change Control Process
  - There is no schedule for the implementation of the 42 candidate change requests now pending
  - BellSouth's 2003 Release Schedule is a shell
    - Only the March release has any stated detail and it is all "Targeted" not scheduled
  - Defects continue to plague implemented releases
    - R10.5 resulted in 22 software defects and 11 documentation defects
    - BellSouth's IT organization appears to lack the ability to improve this situation in the near future
  - The Florida PSC begun to take action to correct the deficiencies it has found to exist through the Third Party Test
    - Flow Through
    - Defect Correction
    - Exception 88
    - Feature Request Implementation Intervals

- Promises of future improvements have not produced the anticipated improvements.

AT&T Broadband Georgia (OCN 7170) Average Claim Interval




AT&T Broadband Florida (OCN 7562) Average Claim Interval
hrs:min
24:00:00
21:36:00
19:12:00
16:48:00
14:24:00
12:00:00
9:36:00
7:12:00
4:48:00
2:24:00
0:00:00
Oct-01
Nov-01
Dec-01
Jan-02
Feb-02
Mar-02
Apr-02
May-02

May 2002 SOA Universes and Samples

(Sources – May Flow Through Report – BellSouth July 23, 2002 Ex Parte)

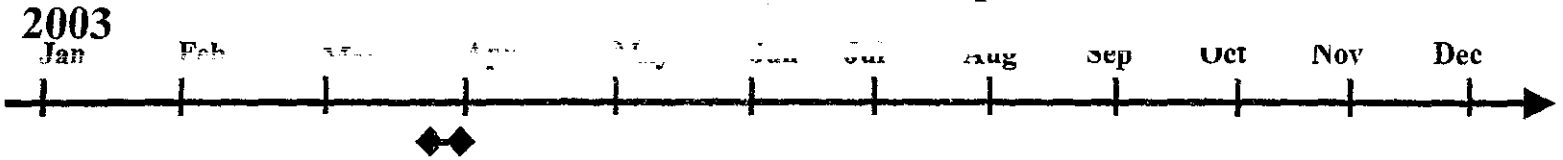
		CLEC LSRs	BellSouth's Reported Service Order Universe for SOA calculation	Service Orders Selected for SOA calculation
1	Total Mechanized LSRs	524,241		
2	Fallout to LCSC	129,008		
3	Mechanized LSR Universe for SOA calculation (1-2)	**395,233**	**58,412**	**730**
4	Manually submitted LSRs ((1 / .93) – 1)	39,459		
5	Non-Mechanized LSR Universe for SOA calculation (2+4)	**168,467**	**202,115**	**1,017**

- BellSouth's reported service order universe for mechanized orders is incomplete
- BellSouth's reported service order universe for non-mechanized orders appears reasonable, but is open to question
- The sample sizes (volume) in BellSouth's calculation remain problematic
- The percent accuracy calculations in BellSouth's July 23, 2002 ex parte for all summary lines are inaccurate and overstate the actual results in all but one case

May 2002 MSS Region-Wide Regulatory Review Mechanized Orders						
Auto Number	SOA Product Classification	Population	Volume	Errors	% Accuracy	
1	Resale Residence < 10 Circuits Non-Dispatched	21776	144	2	98.61%	
2	Resale Residence > = 10 Circuits Non-Dispatched	0	0	0	0	
3	Resale Residence < 10 Circuits Dispatched	1170	166	10	93.98%	
4	Resale Residence > = 10 Circuits Dispatched	12	12	0	100.00%	
	Resale Residence Mechanized	**22958**	**322**	**12**	**98.37%**	96.27
5	Resale Business < 10 Circuits Non-Dispatched	2806	86	2	97.67%	
6	Resale Business > = 10 Circuits Non-Dispatched	0	0	0	0	
7	Resale Business < 10 Circuits Dispatched	455	59	6	89.83%	
8	Resale Business > = 10 Circuits Dispatched	3	3	0	100.00%	
	Resale Business Mechanized	**3264**	**148**	**8**	**96.54%**	94.59
9	Resale Design < 10 Circuits Non-Dispatched	0	0	0	0	
10	Resale Design > = 10 Circuits Non-Dispatched	0	0	0	0	
11	Resale Design < 10 Circuits Dispatched	0	0	0	0	
12	Resale Design > = 10 Circuits Dispatched	0	0	0	0	
	Resale Design Mechanized	**0**	**0**	**0**	**0**	✓
13	UNE Design < 10 Circuits Non-Dispatched	0	0	0	0	
14	UNE Design > = 10 Circuits Non-Dispatched	0	0	0	0	
15	UNE Design < 10 Circuits Dispatched	3664	47	0	100.00%	
16	UNE Design > = 10 Circuits Dispatched	6	6	0	100.00%	
	UNE Design Mechanized	**3670**	**53**	**0**	**100.00%**	✓
17	UNE Non-Design < 10 Circuits Non-Dispatched	26015	122	0	100.00%	
18	UNE Non-Design > = 10 Circuits Non-Dispatched	1	1	0	100.00%	
19	UNE Non-Design < 10 Circuits Dispatched	2488	68	5	92.65%	
20	UNE Non-Design > = 10 Circuits Dispatched	16	16	3	81.25%	
	UNE Non-Design Mechanized	**28520**	**207**	**8**	**99.35%**	96.14
	Totals	**58412**	**730**	**28**	**98.85%**	96.16

May 2002 MSS Region-Wide Regulatory Review Non-Mechanized Orders						
Auto Number	SOA Product Classification	Population	Volume	Errors	% Accuracy	
1	Resale Residence < 10 Circuits Non-Dispatched	114666	26	0	100.00%	
2	Resale Residence > = 10 Circuits Non-Dispatched	0	0	0	0	
3	Resale Residence < 10 Circuits Dispatched	4891	29	8	72.41%	
4	Resale Residence > = 10 Circuits Dispatched	2	2	0	100.00%	
	Resale Residence Non-Mechanized	**119559**	**57**	**8**	**98.87%**	85.96
5	Resale Business < 10 Circuits Non-Dispatched	2882	94	5	94.68%	
6	Resale Business > = 10 Circuits Non-Dispatched	27	27	2	92.59%	
7	Resale Business < 10 Circuits Dispatched	272	111	13	88.29%	
8	Resale Business > = 10 Circuits Dispatched	15	15	4	73.33%	
	Resale Business Non-Mechanized	**3196**	**247**	**24**	**93.99%**	90.28
9	Resale Design < 10 Circuits Non-Dispatched	144	140	12	91.43%	
10	Resale Design > = 10 Circuits Non-Dispatched	13	13	1	92.31%	
11	Resale Design < 10 Circuits Dispatched	45	41	8	80.49%	
12	Resale Design > = 10 Circuits Dispatched	2	2	0	100.00%	
	Resale Design Non-Mechanized	**204**	**196**	**21**	**88.73%**	89.29
13	UNE Design < 10 Circuits Non-Dispatched	82	82	27	67.07%	
14	UNE Design > = 10 Circuits Non-Dispatched	5	5	0	100.00%	
15	UNE Design < 10 Circuits Dispatched	1511	73	0	100.00%	
16	UNE Design > = 10 Circuits Dispatched	17	17	0	100.00%	
	UNE Design Non-Mechanized	**1615**	**177**	**27**	**98.33%**	84.75
17	UNE Non-Design < 10 Circuits Non-Dispatched	73204	28	0	100.00%	
18	UNE Non-Design > = 10 Circuits Non-Dispatched	82	78	1	98.72%	
19	UNE Non-Design < 10 Circuits Dispatched	4128	107	2	98.13%	
20	UNE Non-Design > = 10 Circuits Dispatched	127	127	0	100.00%	
	UNE Non-Design Non-Mechanized	**77541**	**340**	**3**	**99.90%**	99.12
	Totals	**202115**	**1017**	**83**	**99.17%**	91.84

CCP Feature Release Implementation Schedule



03/29/03 – 03/30/03 12.0 BellSouth Production Release
•Interactive Agent – EDI - #1 CCP Prioritized (CR0186) – TARGETED
•EDI Pre-Ordering – #2 CCP Prioritized (CR0101)- TARGETED
•Correct Ringmaster RNP - #7 FTTF (CR0495) - TARGETED
•Multi Feature Discount - #9 FTTF (CR0496) - TARGETED
•4-Wire Digital Loops - #12 FTTF (CR0729) - TARGETED
•MemoryCall Access #-LENS Viewable - #14 FTTF (CR 0674) - TARGETED

LEGEND

Underlined and Not Bold = Completed Release Cycle

Bold = Release Cycle in progress

Italicized and not Bold = Release Cycle not in progress

Feature justifications are in parentheses:

Mandates= Type 2 , Standards = Type 3, BST Initiated CR = Type 4,
CLEC Initiated CR= Type 5, Defect = Type 6

(CAVE) = Must be tested in CAVE prior to this date:4wks Major/2wks Minor if applicable; CLEC Testing will begin on the Monday following CAVE implementation

"TARGETED" - the planning work to include this item in the indicated release is ongoing. A final determination as to whether the item will be included in the release has not been made. Factors such as regulatory mandates, information uncovered in further planning efforts, or other unforeseen circumstances may impact whether the item will be included in the indicated release.

BELLSOUTH

May 2, 2002
CCP Process Improvement Workshop Meeting
Review of CLEC Red-Line/BellSouth Green-Line Document
MEETING MINUTES

MEETING NAME	MINUTES PREPARED BY	DATE PREPARED
CCP IMPROVEMENT WORKSHOP Review of Red-Line/Green-Line Document BellSouth Center	Cheryl Storey - Change Management Team	5-6-02

BellSouth Participants/Attendees

PARTICIPANT	COMPANY
Valerie Cottingham	BST – CCP
Cheryl Storey	BST - CCP
Steve Hancock	BST – CCP
Rose Kirkland	BellSouth Technology
Dennis Davis	BST - CCP.
Doyle Mote	BST - LCSC
Linda Jones	BST - CCP

PARTICIPANT	COMPANY
Blanche Lafavor *	BST – Vendor Support
Kathy Rainwater	BST - CCP
David Scollard *	BST - Billing
Marcia Terry	BellSouth Technology
Meena Masih	BST – Release Mgt
Susan Arrington	BST - Regulatory
Michael Sims	BST - Regulatory

CLEC & Other Participants/Attendees

PARTICIPANT	COMPANY
John Duffey *	FL - PSC
Graham Watkins	KPMG Consulting
Leon Bowles	GA PSC
Mary Conquest	ITC/Deltacom
Bernadette Seigler	AT&T
Kyle Kopytchak	Network Telephone
Rick Wisamore *	WorldCom
Colette Davis	Covad
Heather Thompson *	Allegiance

PARTICIPANT	COMPANY
Jay Bradbury	AT&T
Patrick Reinhardt	GA PSC
Sheriann Lively	NuVox
Shamone Stapler *	ITC/DeltaCom
Dale Donaldson *	Epb
Tyra Hush	WorldCom
Sherry Lichtenberg	WorldCom
Steve Taff *	Allegiance
Cheryl Haynes *	NuVox

*Participated via Conference Bridge

Meeting Information History

DATE	START TIME	END TIME
05/02/02	9:30 AM ET	3:00 PM ET

MEETING PURPOSE
To discuss the Red-Line (CLEC)/ Green-Line (BST) Documented changes of the Change Control Process.

MANAGEMENT PRACTICES
- Welcome
- Capability Maturity Modeling
- Team & Personal Software Process
- IDEAL Model
- Risk Management
- Software Engineering Measurement & Analysis (SEMA)
- Information Repositories
- Complete Technical Project List
- Common Acronyms
- Featured Publications
- Technical Initiatives
- Conferences
- Education & Training

Capability Maturity Model® (SW-CMM®) for Software

The Capability Maturity Model for Software describes the principles and practices underlying software process maturity and is intended to help software software organizations improve the maturity of their software processes in terms of an evolutionary path from ad hoc, chaotic processes to mature, disciplined software processes. The CMM is organized into five maturity levels:

1) Initial. The software process is characterized as ad hoc, and occasionally even chaotic. Few processes are defined, and success depends on individual effort and heroics.

2) Repeatable. Basic project management processes are established to track cost, schedule, and functionality. The necessary process discipline is in place to repeat earlier successes on projects with similar applications.

3) Defined. The software process for both management and engineering activities is documented, standardized, and integrated into a standard software process for the organization. All projects use an approved, tailored version of the organization's standard software process for developing and maintaining software.

4) Managed. Detailed measures of the software process and product quality are collected. Both the software process and products are quantitatively understood and controlled.

5) Optimizing. Continuous process improvement is enabled by quantitative feedback from the process and from piloting innovative ideas and technologies.

Predictability, effectiveness, and control of an organization's software processes are believed to improve as the organization moves up these five levels. While not rigorous, the empirical evidence to date supports this belief.

Except for Level 1, each maturity level is decomposed into several key process areas that indicate the areas an organization should focus on to improve its software process.

The key process areas at Level 2 focus on the software project's concerns related to establishing basic project management controls. They are Requirements Management, Software Project Planning, Software Project Tracking and Oversight, Software Subcontract Management, Software Quality Assurance, and Software Configuration Management.

The key process areas at Level 3 address both project and organizational issues, as the organization establishes an infrastructure that institutionalizes effective software engineering and management processes across all projects. They are Organization Process Focus, Organization Process Definition, Training Program, Integrated Software Management, Software Product Engineering, Intergroup Coordination, and Peer Reviews.

The key process areas at Level 4 focus on establishing a quantitative understanding of both the software process and the software work products being built. They are Quantitative Process Management and Software Quality Management.

The key process areas at Level 5 cover the issues that both the organization and the projects must address to implement continual, measurable software process improvement. They are Defect Prevention, Technology Change Management, and Process Change Management.

Each key process area is described in terms of the key practices that contribute to satisfying its goals. The key practices describe the infrastructure and activities that contribute most to the effective implementation and institutionalization of the key process area.

For a more detailed overview of the CMM, see:

- Mark C. Paulk, Bill Curtis, Mary Beth Chrissis, and Charles V. Weber, "Capability Maturity Model, Version 1.1," IEEE Software, Vol. 10, No. 4, July 1993, pp. 18-27.

or the CMM itself. Version 1.1 of the CMM, which was released in 1993, is now available as a book:

- Carnegie Mellon University, Software Engineering Institute (Principal Contributors and Editors: Mark C. Paulk, Charles V. Weber, Bill Curtis, and Mary Beth Chrissis), *The Capability Maturity Model: Guidelines for Improving the Software Process*, ISBN 0-201-54664-7, Addison-Wesley Publishing Company, Reading, MA, 1995.

For information on the benefits of CMM-based software process improvement, see:

- James Herbsleb, Anita Carleton, et al., "Benefits of CMM-Based Software Process Improvement: Initial Results," Software Engineering institute, CMU/SEI-94-TR-13, August 1994.
- Patricia K. Lawlis, Robert M. Flowe, and James B. Thordahl, "A Correlational Study of the CMM and Software Development Performance," Crosstalk: The Journal of Defense Software Engineering, Vol. 8, No. 9, September 1995, pp. 21-25.

Also see the CMM-related articles.

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URL: http://www.sei.cmu.edu/cmm/cmm.sum.html
Last Modified: 24 April 2002

FCC

July 25, 2002

- AT&T Data Integrity Issues
  - AT&T's analysis was valid
  - Negative intervals and other data errors
  - "Business rule differences" now need system fixes
  - Role of cancelled orders in data discrepancies unclear
  - What happens to post FOC clarifications?
  - BellSouth is not providing complete raw data files
  - Planned manual fallout isn't in synch with actual flow-through
- BellSouth Ex Partes
- Georgia and Florida Audits
- Data Reconciliation
  - Structured, reliable process is needed
- Florida Third Party Test

Status of "Key" Measures in Florida Audit

"Key" Measure	Data Integrity Audit Status
Pre-Order Response Interval	Testing not complete in 2.6. Will test in 4.0
System Availability –Pre-Order/Order	Completed in 2.6. Will test in 4.0
Loop Make-Up Response Time	Completed in 2.6. Will test in 4.0
Acknowledgement Timeliness	**Could not be tested in 2.6.**
% Rejected Service Requests	Tested in 2.6 – open exceptions (120 and 143) **LNP could not be tested in 2.6**
FOC Timeliness	Tested in 2.6 – open exceptions (114 and 145) **LNP could not be tested in 2.6**
Reject Interval	Tested in 2.6 – open exceptions (36 and 144) **LNP could not be tested in 2.6**
Flow-Through	Tested in 2.6 – open exceptions (113 and 124)
Missed Appointments	**Could not be tested in 2.6.**
Average Completion Notice Interval	**Could not be tested in 2.6.**
% Provisioning Troubles in 30 days	**Could not be tested in 2.6.**
% Jeopardies	**Could not be tested in 2.6.**
Average Order Completion Interval	**Could not be tested in 2.6.**
Mean Held Order Interval	**Could not be tested in 2.6.**
Coordinated Customer Conversions	Completed in 2.6. Will test in 4.0.
Service Order Accuracy	Completed in 2.6. Will test in 4.0.
M&R Interface Availability	Completed in 2.6. Will test in 4.0.
M&R Response Interval	Completed in 2.6. Will test in 4.0.
Missed Repair Appointments	**Could not be tested in 2.6.**
Maintenance Average Duration	**Could not be tested in 2.6.**
% Repeat Troubles in 30 days	**Could not be tested in 2.6.**
Customer Trouble Report Rate	**Could not be tested in 2.6.**
Invoice Accuracy	Completed in 2.6. Will test in 4.0.
Mean Time To Deliver Invoices	Completed in 2.6. Will test in 4.0.
Usage Data Accuracy	Completed in 2.6. Will test in 4.0.
Usage Data Delivery Timeliness	Completed in 2.6. Will test in 4.0.
Usage Data Delivery Completeness	Completed in 2.6. Will test in 4.0.
Trunk Group Performance	Completed in 2.6. Will test in 4.0.
% Due Dates Missed Collocation	Completed in 2.6. Will test in 4.0.

Other measures not tested in 2.6:

1. Acknowledgment Completeness
2. % rejected svc requests, reject interval, and FOC interval for trunks
3. FOC and Reject Completeness
4. % Completions/Attempts with no Notice
5. % Cooperative Acceptance Testing – xDSL
6. LNP Disconnect Timeliness
7. M&R Out of Service > 24 hours
8. M&R Average Time to Answer

Florida Third Party Test Report and Workshop

- KCI concluded that BellSouth failed to meet test criteria in key areas. Open exceptions will not be resolved by the time KCI concludes its testing. Accordingly, ALECs and this Commission cannot know when, and if, BellSouth will correct these known deficiencies.

- KCI's third-party test is incomplete. KCI has not been able to verify BellSouth's self-reported commercial data and KCI will not complete its Performance Metrics evaluation until October 31, 2002. Absent verified performance data, this Commission lacks an appropriate yardstick by which to measure BellSouth's performance in this state.

- KCI's testing does not provide a complete portrait of BellSouth's OSS performance in Florida. Many of KCI's tests focused on the existence of documentation, not whether BellSouth adhered to those documented procedures. In important areas such as change management, KCI's testing failed to demonstrated the impact of BellSouth's deficiencies on ALECs' ability to compete.

- KCI did not test all of what ALECs order in this state and disregarded certain Commission-established parity standards in favor of its own standards.

- KCI's testing does not provide this Commission a like-to-like comparison of BellSouth's retail and wholesale systems.

Florida Third Party Test

Status of Areas "Not Satisfied"

Issue	Exceptions	PSC Action to Address
Change Management		
The change management process has a framework to evaluate, categorize, and prioritize proposed changes	E-88—The framework did not provide ALECS with the ability to prioritize, categorize, assess the impact of, and plan resources for all change requests affecting the ALEC community.	Staff has recommended that BST's End-to-end process flow be implemented to address issues in Exception 88. ALECs disagree with this recommendation. The Staff recommendation was adopted on July 23. The Staff has indicated it make a recommendation regarding theALEC request for implementation intervals for Change requests. A positive recommendation, if adopted, could offset some of the problems caused by BST's proposed process.
The change management process includes procedures for allowing input from all interested parties	E-88-The process did not allow ALECS to provide input to all change requests.	Same as above
Criteria are defined for prioritizing and assigning severity codes to change requests	E-88-	Same as above.
Documentation regarding proposed changes is distributed on a timely basis.	E-123. BellSouth was not classifying defects in accordance with the definition. Therefore, BST was not providing documentation of system defects.	PSC ordered new metrics --% software errors corrected in x days --Number of defects in --production releases Software validation
Interface Development		
BellSouth has a software/interface methodology that addresses requirements and specification definition, design, development, testing, and implementation.	E-157.—The methodology is not consistently followed.	PSC adopted staff recommendation and ordered 3 new metrics --% software errors corrected in x days --Number of defects in - production releases

Florida Third Party Test

		--Software validation
Interface development methodology has a defined quality assurance process	E-157.-- Quality assurance process is not consistently followed	Same as above.
A software and interface development methodology exists that defines the process for release management and control.	E-157—Process is not consistently followed.	Same as above.
Functional Ordering/Pre-Ordering		
BellSouth's systems or representatives provide accurate and complete error and clarification messages.	E-165. Errors include business rule errors and employee errors.	
BellSouth's manual order process provides reject responses within the agreed upon standard interval	E-161. 83.33% received din 24 hours.	
Flow-Through		
BellSouth systems process UNE order transactions in accordance with published flow-through rules	E-122 DSL orders. E-136. 74.60% flowed through (85% is standard)	PSC adopted Staff recommendation which requires BST to file an action plan by July 30 that provides timelines by which it will meet benchmarks, and increased penalty payments.
BellSouth systems process LNP order transactions in accordance with published flow-through rules	E-121 82.35 flowed through (85% is standard)	Although only E-136 was referenced, the Staff recommendation applied to all elements of flow-through.
Provisioning Verification and Validation		
BellSouth's directory assistance database contains require field inputs	E-171 Standard is 95% accurate. During last re-test, BST provisioned 85.5% of DL listings accurately.	
BellSouth's switch translations contains require field inputs.	E-84 Standard is 95% accurate. During last re-test, BST provisioned 90% of switch	

Florida Third Party Test

	translations accurately.	
BellSouth provisioned switch translations and updated customer service records in accordance with the submitted LSRs	E-84 Standard is 95% accurate. During last re-test, BST provisioned 79% of orders where switch translations and CSRs were updated accurately.	
BellSouth provisioned directory listings and updated customer service records in accordance with the submitted LSRs	E-171. Standard is 95% accurate. During last re-test, BST provisioned 80% of orders where directory listings and CSRs were updated accurately.	